

# Morgan Lewis

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July 9, 2020

So ordered.

**VIA ECF AND FAX (212.805.7942)**

Alvin K. Hellerstein /s/  
July 9, 2020

The Honorable Judge Alvin K. Hellerstein  
United States District Judge for the Southern District of New York  
500 Pearl St., Rm. 1050  
New York, NY 10007-1312

Re: Cunningham, et al. v. General Motors LLC, et al., Case No. 20-cv-03097-AKH

Dear Judge Hellerstein:

We represent Defendant Shannon E. Wallace ("Ms. Wallace") in the above-captioned matter and write in accordance with Rule 1.D. of Your Honor's Individual Rules and with consent from Plaintiffs' counsel to respectfully request an extension of Ms. Wallace's time to answer, move or otherwise respond to the Complaint from July 27, 2020 to August 28, 2020, when Defendant General Motors LLC's response is due. This is Ms. Wallace's first request for an extension of her time to respond to the Complaint and the requested extension would not affect any other deadlines in this matter. Ms. Wallace requests this extension in order to provide her with additional time to investigate and respond to the allegations set forth in the Complaint while managing the disruption caused by the coronavirus global pandemic.

Thank you for your consideration.

Sincerely,

s/ Melissa C. Rodriguez  
Melissa C. Rodriguez

cc: All counsel of record (via ECF)

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